

Kristin Brayman
Pure Romance Consultant

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Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Pure Romance Consultant. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell Pure Romance products. Yes, there are many "pyramid schemes" out there that exploit people, but the percentage of those is few when compared to the large number of legitimate business opportunities that Direct Sales companies offer, and I believe this new bill will hurt these companies more than it will stop the "pyramid schemes".

I have been a Pure Romance Consultant for more than 2 years. I became a consultant in my company because I felt the products were exceptional and I wanted to earn some additional income. I am a college student, and this business is the best way for me to support myself and my education. Working as a Pure Romance consultant is much more effective for me than participating in a work-study program, or getting a retail job off campus. Being able to set my own hours and control how much and how long I work has been a deciding factor in how much attention I can give to my education. By being a Pure Romance consultant, I have plenty time for classes and homework, time for myself and my friends, and enough money to pay for all the things I need to further my education, without the normal stress levels of other college students. I hope to keep my business after I graduate to continue to support myself, and possibly a family in the future.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new consultants. Pure Romance sales kits only costs \$250, though some new consultants choose to buy higher priced kits (\$250, \$500, and \$1000, all at half the cost of the retail products included). People buy TVs, cars, and other items that cost much more and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. It is unnecessary to ask new Pure Romance consultants to wait this time period, because they usually want to get started right away, and if they change their minds, there are a number of compensation options. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Pure Romance and will then need to send in many reports to my company headquarters. Records are helpful, but I have done a very good business so far, and having to keep such details is not a good use of my time and does not help me further my business.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or

businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Pure Romance headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson - "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended consequences and there are less burdensome alternatives available to achieving your goals. It is unfair to penalize legitimate businesses for the wrongs of the scammers.

Thank you for your time in considering my comments.

Respectfully,

Kristin Brayman